

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Notice of Proposed Rulemaking)	
18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
)	
And)	
)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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March 4, 2013

AFFIDAVIT OF

State of Illinois]

DuPage County]

I, Jennifer Elder, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Jennifer Elder . My address is 746 Torrington Drive, Naperville, IL 60565.
2. I left my job as a sales manager to raise my children in May of 2008.
3. Current FCC guidelines only address thermal tissue damage. Considering that many studies demonstrate that significant harmful biological effects occur from non-thermal RF exposure, the FCC needs to update the guidelines to include non-thermal RF exposure limits or needs to have the EPA appointed to do so. It is the responsibility of the FCC to protect the public health and safety from harm from radiofrequency radiation. This includes thermal and non-thermal radiation. Without complete and updated guidelines from the FCC or another government agency, companies that make devices that emit radiofrequency radiation are left to regulate themselves, and often rely on outdated FCC guidelines to act irresponsibly, putting public health and safety at risk.
4. The World Health Organization has classified radiofrequency emissions as a group 2 B carcinogen. The United States President's Cancer Panel Report (2010) includes important and unprecedented recognition of non-ionizing radiation as a possible carcinogen deserving of further research and possible public health action. The US Government Accountability Office published a report in 2012 urging the US Federal Communications Commission to revisit the outdated safety standards for the exposures from wireless devices. In fact, studies from around the world, continue to demonstrate non-thermal effects are harmful, and that FCC limits are outdated and way too high. The BioInitiative

2012 outlines many of these studies and points out that public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects.

5. Bioeffects and adverse health effects are occurring at lower-than-safety-limit levels.

Though the extent of adverse health effects still needs to be studied, we already know that adverse health effects from non-ionizing radiofrequency radiation exists. It would be irresponsible for the FCC to continue with the current outdated guidelines. Compliance with the FCC's outdated guidelines is often cited as an excuse to ignore the harmful effects of devices that emit harmful levels of radiofrequency radiation.

6. Since the FCC does not have the ability to set appropriate guidelines that consider the non-thermal bioeffects of radiofrequency radiation, the FCC should advocate that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task.

Respectfully submitted by,

Jennifer Elder

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March 4, 2013